



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

RQ-3

October 12, 2000

Clifford A. Schulman, Treasurer
Greenberg, Traurig, Hoffman, Lipoff, Rosen
& Quentel, P A Political Action Committee
1221 Brickell Avenue
Miami, FL 33121

Identification Number: C00266585

Reference: April Monthly (3/01/00-3/31/00) and July Monthly (6/01/00-6/30/00)
Reports

Dear Mr. Schulman:

This letter is to inform you that as of October 11, 2000, the Commission has not received your response to our requests for additional information dated September 20, 2000. These notices request information essential to full public disclosure of your federal election campaign finances. To ensure compliance with the provisions of the Federal Election Campaign Act (the Act), please respond to these requests (copies enclosed).

An adequate response must be received at the Commission by November 1, 2000. Adequate responses received on or before this date will be taken into consideration in determining whether audit action will be initiated. **Requests for extensions of time in which to respond will not be considered.** Failure to provide an adequate response by this date may result in an audit of the committee. Failure to comply with the provisions of the Act may also result in an enforcement action against the committee. Any response submitted by your committee will be placed on the public record and will be considered by the Commission prior to taking enforcement action.

--- If you should have any questions regarding this matter, please contact Neil Evans on our toll-free number (800) 424-9530 (at the prompt press 1, then press 2 to reach the Reports Analysis Division) or our local number (202) 694-1130.

Sincerely,

John D. Gibson
Assistant Staff Director
Reports Analysis Division

Enclosures



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20461

RQ-2

Clifford A. Schulman, Treasurer
Greenberg, Traurig, Hoffman, Lipoff,
Rosen & Quentel, P A Political Action
Committee
1221 Brickell Avenue
Miami, FL 33121

SEP 20 2000

Identification Number: C00266585

Reference: July Monthly Report (6/01/00-6/30/00)

Dear Mr. Schulman:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

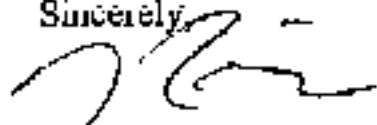
-Line 23 of the Detailed Summary Page of your report discloses a total of \$21,500 in contributions to federal candidates/committees and other political committees. The sum of the entries itemized on Schedule B, however, indicates the total to be \$20,500. Please amend your report to clarify the discrepancy.

-Schedule A supporting Line 11(a)(i) of your report discloses contributions received through what appears to be a payroll deduction plan. Please amend your report to disclose the frequency of deduction. 11 CFR §104.8(b) Please refer to the enclosed sample of properly reported payroll deductions.

A written response or an amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our

toll-free number, (800) 424-9530 (at the prompt press 1, then press 2 to reach the Reports Analysis Division). My local number is (202) 694-1130.

Sincerely,

A handwritten signature in black ink, appearing to read 'Neil A. Evans', written over the word 'Sincerely,'.

Neil A. Evans
Reports Analyst
Reports Analysis Division

PAYROLL DEDUCTIONS

SCHEDULE A		ITEMIZED RECEIPTS		City Income Taxpayer or non-taxpayer of the General Highway Fund		PAGE OF
Contributions from Individuals				FOR USE ONLY BY THE 11 (a)(1)		
Any individual's record may be used to determine the amount of any credit or any portion of the amount of the credit in making adjustments of the individual's tax liability. Credit may also be used to determine the amount of any refund or credit in making adjustments of the individual's tax liability.						
Name of contributor (in full) National Organization PAC				000000001		
A. Full name, mailing address and ZIP Code Anna Sullivan 21 1022 Street City, State ZIP				Name of business National Organization, Inc.		Amount of cash received for taxes \$72.00
Received for _____ Cash account _____ Other _____				Payroll deduction Branch Manager		\$12 (weekly)
B. Full name, mailing address and ZIP Code Rodney Jones 661 Hambury Road City, State ZIP				Name of business National Organization, Inc.		Amount of cash received for taxes \$120.00
Received for _____ Cash account _____ Other _____				Payroll deduction Vice President		\$20 (weekly)

Reverse payroll deductions only after they have exceeded \$200 per calendar year from an individual.

IN-KIND CONTRIBUTIONS

SCHEDULE A ITEMIZED RECEIPTS		Use separate schedules for each category of the Deductible Business Expense	PAGE 27 OF LINE NUMBER 1100X3
Contributions from Individuals			
An individual cannot deduct any portion of the amount paid for an expense if the amount is for the purpose of securing compensation or for services rendered, other than legal and medical or any other expenditure for the individual, their family or dependent.			
NAME OF CONTRIBUTOR (If Paid) NATIONAL ORGANIZATION PAC 000000001			
4. Use separate schedules for each of the following:			
NAME OF CONTRIBUTOR Martin L. Krue 4 River Road City, State ZIP	DATE OF CONTRIBUTION 8/10/82	AMOUNT PAID \$3,999.00	AMOUNT DEDUCTIBLE (IN-EXCHG) (TRAFFLE) PAID:
5. If the contribution is for a specific purpose, enter the purpose here:			
Chairman			
Chairman			
Amount Paid (If Different) 3,999.00			

[illegible]

Itemize in-kind contributions on both Schedules A and B so as not to affect the cash-on-hand amount.

Payroll Deductions

Once an individual's deductions aggregate over \$200 in a calendar year, report the total amount deducted from the donor's paychecks during the reporting period on Schedule A. In parentheses indicate the amount that was deducted each pay period. Instead of stating a specific date of receipt, write "payroll deduction" under "Date." The other itemized information, including the year-to-date total, must be completed for each donor. 104.8(b).

EXAMPLE: During an election year, a corporate manager authorizes her employer to deduct \$12 per pay period (each pay period is two weeks) for the company's SSF. The SSF, which files FEC reports on a quarterly schedule, includes the manager's contributions as "undemized contributions" in its April and July quarterly reports. By June 30, the closing date for the July report, the manager's aggregate contributions are \$195 — still below the \$200 itemization threshold. By September 30 — the closing date for the October quarterly report — the manager's contributions reach \$228. Therefore, the committee itemizes the total contributions received from the manager during the third quarter (\$120), providing the year-to-date total in the appropriate space. (See Item A in the illustration above.)

In-Kind Contributions

When determining whether to itemize an in-kind contribution, follow the same guidelines listed above under "When to Itemize Receipts." See Chapter 2 for information on how to determine the dollar value of an in-kind contribution.

In addition, add the value of the in-kind contribution to the operating expenditures total on Line 21(b) (in order to avoid inflating the cash-on-hand amount). 104-13(g)(2).

If the in-kind contribution must be itemized on Schedule A, then it must also be itemized on a Schedule B for operating expenditures. See the illustration at right.

Appreciated Goods

When a committee receives an in-kind contribution whose value may

